

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA

v.

S3 15 Cr. 867 (RMB)

REZA ZARRAB, et al.,

Defendants.
:
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**NOTICE OF DEFENDANT MEHMET HAKAN ATILLA'S
OMNIBUS PRETRIAL MOTIONS**

PLEASE TAKE NOTICE, that, upon the accompanying Memorandum of Law and the Declaration of Thomas E. Thornhill with attached exhibit, the undersigned will move this Court, before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York 10007, for an order granting the following motions of Defendant Mehmet Hakan Atilla ("Mr. Atilla"):

- (1) to dismiss Superseding Indictment S3 ("Indictment") as a result of lack of adequate notice;
- (2) to dismiss the Indictment for lack of subject-matter jurisdiction;
- (3) or alternatively, to sever Mr. Atilla's case from that of Defendant Reza Zarrab for misjoinder, in violation of Fed. R. Crim. P. 8(b).

PLEASE TAKE FURTHER NOTICE, that, upon prior order of the Court, answering papers, if any, shall be served on or before August 14, 2017, and any reply papers shall be served on or before August 21, 2017, with oral argument to be heard on September 7, 2017 at 11:00 a.m.

Dated: New York, New York
July 31, 2017

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